From: Quinones, Edwin
To: Quinones, Edwin

Subject: Litigation Hold notice regarding Citgo"s potential Clean Water Act violations

Date: Tuesday, February 12, 2013 3:03:55 PM

Good day,

We have identified you as an individual who may have responsive information for the U.S. v. Citgo Clean Water Act Litigation Discovery Production. Our list was developed from a list provided by Edwin Quinones, legal counsel assigned to this litigation.

While formal litigation hold instructions may not have been previously circulated for this litigation, you may have received previous informal litigation hold instructions on or after November 26, 2008. Since EPA has switched over to the new EnCase system this is a re-issuance of the original litigation hold. Accordingly, all Agency employees with possession, custody or control of any materials, whether paper, electronic, or tangible things, such as laboratory samples or other physical evidence, that are potentially relevant to this matter are directed to preserve those materials until further notice.

Please click the link below to view the entire litigation hold notice and questions pertaining to this matter. NOTE: You must be logged into the EPA Network to access this link.

We recognize that your time is valuable and appreciate your cooperation - the legal team is also expending considerable time and resources to support this matter and appreciates your continued support.

Failure to promptly respond to the questions found at the end of the litigation hold notice will result in automatic reminders to your email account until compliance is obtained.

DO NOT DELETE THIS EMAIL - YOU WILL NEED THIS LINK TO ACCESS THE LITIGATION HOLD NOTICE FOR FUTURE REFERENCE.

Thank you,

Jake

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